

2. Defendants have, and continue to produce documents as they are able to locate them. Defendants, have simply complied with the requirements of the Federal Rules of Civil Procedure and provided supplemental and additional documents as they have been located, discovered and/or created. If Defendants did not make these supplementations, or chose to wait until all of the documents were available before responding to Plaintiffs' discovery requests, Plaintiffs would no doubt be alleging they had been prejudiced. Plaintiffs cannot have it both ways.

3. Defendants, as recently as last week, provided wage and hour reports for the numerous Plaintiffs, covering nearly twelve months during the period in which Plaintiffs allege they were not paid all wages owed to them.

4. Furthermore, Plaintiff's Motion to Compel is vague and ambiguous and fails to state with any specificity what relief they are seeking.

WHEREFORE, Defendants Argo Enterprises, Inc., Argo Management Group and Valentin Abgaryan respectfully requests that this Honorable Court:

A. Deny Plaintiffs' Motion to Compel Argo Enterprises, Inc., Argo Management Group and Valentin Abgaryan to Produce Documents;

B. Grant such further relief as this Court deems necessary under the facts and circumstances of this case.

Respectfully submitted,

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VALENTIN ABGARYAN
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 18th day of June 2009, a copy of Argo Enterprises, Inc., Argo Management Group and Valentin Abgaryan's Opposition to Plaintiffs' Motion to Compel Argo Enterprises, Inc., Argo Management Group and Valentin Abgaryan to Produce Documents was sent by electronic mail to:

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